

## **Exhibit A**

**Williamson, John**

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**From:** Dunner, Don  
**Sent:** Tuesday, July 25, 2006 3:00 PM  
**To:** 'edward.reines@weil.com'  
**Cc:** Steven.Cherny@lw.com; david.nelson@lw.com; Williamson, John; jessica.davis@weil.com; Sonal.Mehta@weil.com  
**Subject:** RE: Experts

Ed:

Your proposal to have Dr. Acampora file a reply validity report on the '633 patent is unacceptable to Telcordia. Dr. Jones filed the opening report on behalf of all defendants and it is therefore too late to offer a new expert on this subject, particularly after Telcordia has already submitted its answering report on this very issue.

Don

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**From:** edward.reines@weil.com [mailto:edward.reines@weil.com]  
**Sent:** Tuesday, July 25, 2006 1:10 PM  
**To:** Dunner, Don  
**Cc:** Steven.Cherny@lw.com; david.nelson@lw.com; Williamson, John; jessica.davis@weil.com; Sonal.Mehta@weil.com  
**Subject:** Experts

Don:

Confirming our discussion at your request:

I informed you that we plan to have Dr. Acampora adopt the Jones opening report on the '633 Patent and also submit any reply in further support. The reason is as follows. The defendants have bent over backwards to avoid submitting multiple briefs, letters, and expert reports on the issues in this case. As part of that effort, the defendants submitted a '633 Report from Jones to accommodate Alcatel, who has used him in the past. Now that Alcatel's case is stayed, Cisco and Lucent will use instead their preferred expert, Dr. Acampora.

Regarding depositions, we propose two days of expert deposition for each witness. For Dr. Acampora, we would make him available for a third day if you thought you needed that.

Best,

Ed

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8/11/2006

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